

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**ZACHARY FRIDLINE,**

**Plaintiff**

**vs.**

**INTEREST MEDIA, INC.,**

**Defendant**

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**Case No. 4:24-cv-01770-MWB**

**Hon. Matthew W. Brann**

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Local Rule 7.1. Plaintiff, Zachary Fridline (“Plaintiff”), by and through its undersigned counsel, files this Consent Motion for Plaintiff to Respond to the Defendant’s Motion to Dismiss (“Motion”). Defendant consents to this Motion, and in support thereof, Plaintiff states as follows:

1. On December 12, the Defendant filed its Motion to Dismiss the Plaintiff’s Complaint.

2. The Plaintiff requires additional time to review the Defendant’s motion, the arguments made therein, and formulate a response, including because of the intervening holiday time.

3. Counsel for Plaintiff conferred with counsel for the Defendant, who agreed to provide the Plaintiff 30 days to respond to the Motion, up to and including January 13, 2025, the 12th being a Sunday.

4. This is Plaintiff’s first request for any extension.

5. Therefore, the Plaintiff respectfully requests that this Court provide the Plaintiff until January 13, 2025 to file a response to the Defendant’s Motion to Dismiss.

RESPECTFULLY SUBMITTED AND DATED this December 18, 2024.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
a@perronglaw.com

**CERTIFICATE OF CONCURRENCE**

Defendant consents to Plaintiff's Motion for Extension of Time to Respond to the Motion to Dismiss for an additional 30 days or up to and including January 13, 2024.

RESPECTFULLY SUBMITTED AND DATED this December 18, 2024.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all attorneys who have entered their appearance on this case.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.

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**Hon. Matthew W. Brann**

**[PROPOSED] ORDER**

This Court having reviewed and considered the Consent Motion for Extension of Time to Respond to the Defendant's Motion to Dismiss, and for good cause shown:

IT IS ORDERED that the Consent Motion is GRANTED and that Plaintiff shall have up to and including January 13, 2025, to respond to Defendant's Motion (Dkt. 10, 11).

DATED this \_\_\_\_ day of December 2024.

BY THE COURT:

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HON. MATTHEW W. BRANN  
U.S. DISTRICT COURT JUDGE